

1 THE HON. RICARDO S. MARTINEZ
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10 UNITED STATES DISTRICT COURT
11 WESTERN DISTRICT OF WASHINGTON
12 AT SEATTLE

13 JACOB T. WILFONG, individually; and
14 DONAMARIE N. WILFONG and
15 DONALD J. WILFONG, individually and
16 the marital community composed
17 thereof,

18 Plaintiffs,

19 v.

20 LYFT, INC., a foreign corporation; LYFT,
21 INC., d/b/a Lyft Washington, Inc., a
22 foreign corporation; ABDIRAZACK A.
23 JAMMA and JANE DOE JAMMA,
24 individually and the marital community
25 composed thereof; and ABDULKADIR A.
26 OMAR and JANE DOE OMAR,

Defendants.

No.: 2:24-cv-00418-RSM

STIPULATED MOTION TO
CONTINUE INITIAL DISCOVERY
DEADLINES

Noted on Motion Calendar: June 6, 2024

STIPULATION

27 Defendant Abdirazack A. Jamma and Jane Doe Jamma, and Plaintiffs Jacob
28 T. Willfong, Donamarie N. Wilfong and Donald J. Wilfong, and Defendants Lyft,
29 Inc., a foreign corporation, and Lyft, INC., d/b/a Lyft Washington, Inc., (collectively,
30 the “Parties”) respectfully request a short extension of the initial discovery

31 STIPULATED MOTION TO CONTINUE CURRENT DISCOVERY
32 DEADLINES PAGE 1
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1 deadlines in this lawsuit.¹ Counsel for Plaintiffs and counsel for Defendant Jamma
2 spoke with each other on May 28th via telephone and agreed to a 30-day extension
3 on the current discovery deadlines. On May 29th, counsel for Defendant Lyft and
4 Defendant Lyft, Inc., d/b/a Lyft Washington, Inc., a foreign corporation, also
5 confirmed her agreement to the 30-day extension of the current discovery deadlines.
6 The parties are attempting early resolution and settlement discussions before
7 incurring the expense of formal discovery.

9 Accordingly, the Parties believe that there is good cause under Federal Rule
10 of Civil Procedure 6(b) and Local Civil Rule 10(g) for a continuance of the initial
11 discovery deadlines.

12 The Parties, through their counsel request and stipulate to the following
13 proposed extensions of the deadlines in the Court's Order Regarding Initial
14 Disclosures, Joint Status Report, and Early Settlement (Dkt. 4):
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26¹ Defendants Abdulkadir A. Omar and Jane Doe Omar have not appeared in the case yet.

Event	Current Deadline	New Deadline Requested
Initial Disclosures Pursuant to FRCP 26(a)(1)	06/07/2024	7/8/2024
Combined Joint Status Report and Discovery Plan as Required by FRCP 26(f) and Local Rule 26(f)	06/14/2024	7/15/2024

DAVIS LAW GROUP, PS

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Attorneys for Defendants Lyft, Inc., a
 foreign corporation, and Lyft, Inc., d/b/a
 Lyft Washington, Inc., a foreign
 corporation

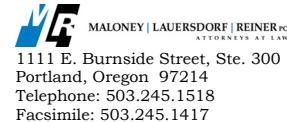
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ORDER

IT IS SO ORDERED this 6th day of June, 2024.


RICARDO S. MARTINEZ
UNITED STATES DISTRICT JUDGE

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CERTIFICATE OF SERVICE

I hereby certify that on April 30, 2024, the STIPULATED MOTION TO
CONTINUE INITIAL DISCOVERY DEADLINES was served on the following
parties at the following address by sending to them a true copy thereof via the method
indicated below:

Courtney Hansen Chris Davis Davis Law Group PS 2101 4 th Ave. #1030 Seattle, WA 98121 courtney@davislawgroupseattle.com chris@davislawgroupseattle.com <i>Of Attorneys for Plaintiffs</i>	Evelyn Winters Vanessa Aaron Bullivant Houser Bailey PC 925 4 th Ave. #3800 Seattle, WA 98104 evelyn.winters@bullivant.com vanessa.aaron@bullivant.com <i>Of Attorneys for Lyft, Inc.</i>
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X by electronic means through the Court's ECF System on the date set forth above.

by mailing a full, true and correct copy thereof in a sealed, first-class postage paid envelope, addressed to the attorneys as shown above, and deposited with the United States Postal Office at Portland, Oregon on the date set forth above.

X by emailing to each of the foregoing a copy thereof to the email address above.

MALONEY LAUERSDORF REINER, PC

By /s/ Katie D. Buxman
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Of Attorneys for Defendants Jamma